

BEFORE THE  
BOARD OF REGISTERED NURSING  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

AMY LYNN JACKSON  
2555 Ruthledge Way  
Stockton, CA 95207

Registered Nurse License No. 731496

Respondent

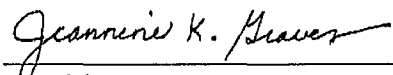
Case No. 2011-691

**DECISION AND ORDER**

The attached Stipulated Surrender of License and Order is hereby adopted by the Board of Registered Nursing, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on **August 11, 2011.**

- IT IS SO ORDERED **August 11, 2011.**

  
\_\_\_\_\_  
President  
Board of Registered Nursing  
Department of Consumer Affairs  
State of California

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Attorney General of California  
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8 **BEFORE THE**  
9 **BOARD OF REGISTERED NURSING**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
11 **STATE OF CALIFORNIA**

12 In the Matter of the Stipulation pursuant to  
Business and Professions Code section 2751:

Case No. 2011-691

13 **AMY LYNN JACKSON**  
2555 Rutledge Way  
14 Stockton, CA 95207

**STIPULATED SURRENDER OF  
LICENSE AND ORDER**

15 **Registered Nurse License No. 731496**

16 Respondent.

17  
18 In the Interest of a prompt and speedy resolution of this matter, consistent with the public  
19 interest and the responsibility of the Board of Registered Nursing of the Department of Consumer  
20 Affairs the parties hereby agree to the following Stipulated Surrender of License and Order which  
21 will be submitted to the Board for approval and adoption as the final disposition of the Stipulation  
22 pursuant to Business and Professions Code section 2751.

23 **PARTIES**

24 1. Louise R. Bailey, M.Ed., RN (Complainant) is the Executive Officer of the Board of  
25 Registered Nursing. She brought this action solely in her official capacity and is represented in  
26 this matter by Kamala D. Harris, Attorney General of the State of California, by Elena L.  
27 Almanzo, Deputy Attorney General.  
28

2. Amy Lynn Jackson (Respondent) is representing herself in this proceeding and has chosen not to exercise her right to be represented by counsel.

3. On or about July 16, 2008, the Board of Registered Nursing issued Registered Nurse License No. 731496 to Amy Lynn Jackson (Respondent). The Registered Nurse License expired on November 30, 2009, and has not been renewed.

## JURISDICTION

4. Pursuant to B& P Code section 2751 the Board of Registered Nursing (Board), Department of Consumer Affairs, may file and adopt this Stipulation without the filing of a pleading when the ability of a registered nurse to practice nursing safely is impaired due to mental or physical illness.

## ADVISEMENT AND WAIVERS

5. Respondent has carefully read, and understands the charges and allegations in this Stipulation pursuant to Business and Professions Code section 2751. Respondent also has carefully read, and understands the effects of this Stipulated Surrender of License and Order.

6. Respondent is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in the Psychiatric Evaluation; the right to be represented by counsel, at her own expense; the right to confront and cross-examine the witnesses against her; the right to present evidence and to testify on her own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

## CULPABILITY

8. Respondent admits that on February 15, 2011, she was convicted of violating Penal Code section 484 (a) (petty theft) and Penal Code section 853.7 (failure to appear) in the criminal proceeding *People v. Amy Lynn Jackson, San Joaquin Superior Court, Case No. SM274347A*. At the time of the convictions, respondent was suffering from mental illness. On or about April

1 30, 2009, Respondent was terminated from the Maximus Diversion Program as a public risk due  
2 to self-reporting relapses of alcohol and drugs. Respondent reported a relapse as of December 9,  
3 2008 (alcohol) and March 5, 2009 (alcohol and other drugs). On June 7, 2010, respondent was  
4 arrested for causing a disturbance and was released to County Mental Health for a 72 hour  
5 detention. Respondent agrees that the convictions are substantially related to the practice of  
6 nursing. Respondent agrees that her license is subject to discipline pursuant to Business and  
7 Professions Code sections 822, 2761 (f), and hereby surrenders her Registered Nurse License No.  
8 731496 for the Board's formal acceptance.

9 9. Respondent understands that by signing this stipulation she enables the Board to issue  
10 an order accepting the surrender of her Registered Nurse License without further process.

11 RESERVATION

12 10. The admissions made by Respondent herein are only for purposes of this proceeding,  
13 or any other proceeding s in which the Board of Registered Nursing or other professional  
14 licensing agency is involved, and shall not be admissible in any other criminal or civil  
15 proceeding.

16 CONTINGENCY

17 11. This stipulation shall be subject to approval by the Board of Registered Nursing.  
18 Respondent understands and agrees that counsel for Complainant and the staff of the Board of  
19 Registered Nursing may communicate directly with the Board regarding this stipulation and  
20 surrender, without notice to or participation by Respondent. By signing the stipulation,  
21 Respondent understands and agrees that she may not withdraw her agreement or seek to rescind  
22 the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt  
23 this stipulation as its Decision and Order, the Stipulated Surrender and Disciplinary Order shall be  
24 of no force or effect, except for this paragraph, it shall be inadmissible in any legal action  
25 between the parties, and the Board shall not be disqualified from further action by having  
26 considered this matter.

12. The parties understand and agree that facsimile copies of this Stipulated Surrender of License and Order, including facsimile signatures thereto, shall have the same force and effect as the originals.

13. This Stipulated Surrender of License and Order is intended by the parties to be an integrated writing representing the complete, final, and exclusive embodiment of their agreement. It supersedes any and all prior or contemporaneous agreements, understandings, discussions, negotiations, and commitments (written or oral). This Stipulated Surrender of License and Order may not be altered, amended, modified, supplemented, or otherwise changed except by a writing executed by an authorized representative of each of the parties.

14. In consideration of the foregoing admissions and stipulations, the parties agree that the Board may, without further notice or formal proceeding, issue and enter the following Order:

**ORDER**

IT IS HEREBY ORDERED that Registered Nurse License No. 731496, issued to Respondent Amy Lynn Jackson, is surrendered and accepted by the Board of Registered Nursing.

15. The surrender of Respondent's Registered Nurse License and the acceptance of the surrendered license by the Board shall constitute the imposition of discipline against Respondent. This stipulation constitutes a record of the discipline and shall become a part of Respondent's license history with the Board.

16. Respondent shall lose all rights and privileges as a registered nurse in California as of the effective date of the Board's Decision and Order.

17. Respondent shall cause to be delivered to the Board her pocket license and, if one was issued, her wall certificate on or before the effective date of the Decision and Order.

18. If Respondent ever files an application for licensure or a petition for reinstatement in the State of California, the Board shall treat it as a petition for reinstatement. Respondent must comply with all the laws, regulations and procedures for reinstatement of a revoked license in effect at the time the petition is filed, and all of the charges and allegations contained in this Stipulation shall be deemed to be true, correct and admitted by Respondent when the Board determines whether to grant or deny the petition.

1        19. If and when Respondent's license is reinstated, she shall pay to the Board costs  
2 associated with its investigation and enforcement pursuant to Business and Professions Code  
3 section 125.3 in the amount of \$1,625.00. Respondent shall be permitted to pay these costs in a  
4 payment plan approved by the Board. Nothing in this provision shall be construed to prohibit the  
5 Board from reducing the amount of cost recovery upon reinstatement of the license.

6        20. If Respondent should ever apply or reapply for a new license or certification, or  
7 petition for reinstatement of a license, by any other health care licensing agency in the State of  
8 California, all of the charges and allegations contained in this Stipulation shall be deemed to be  
9 true, correct, and admitted by Respondent for the purpose of any Statement of Issues or any other  
10 proceeding seeking to deny or restrict licensure.

11        21. Respondent shall not apply for licensure or petition for reinstatement for one (1) years  
12 from the effective date of the Board of Registered Nursing's Decision and Order.

1  
2 ACCEPTANCE

3 I have carefully read the Stipulated Surrender of License and Order. I understand the  
4 stipulation and the effect it will have on my Registered Nurse License. I enter into this  
5 Stipulated Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to  
6 be bound by the Decision and Order of the Board of Registered Nursing.

7  
8 DATED:

June 6, 2011

Amy Lynn Jackson  
AMY LYNN JACKSON  
Respondent

ENDORSEMENT

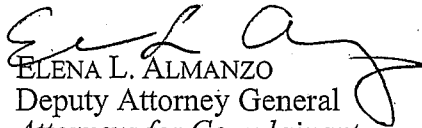
The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted for consideration by the Board of Registered Nursing of the Department of Consumer Affairs.

Dated:

6/14/2011

Respectfully submitted,

KAMALA D. HARRIS  
Attorney General of California  
ARTHUR D. TAGGART  
Supervising Deputy Attorney General

  
ELENA L. ALMANZO  
Deputy Attorney General  
*Attorneys for Complainant*

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